

BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

**KAREN LYNN FORD, aka  
KAREN L. FORD, aka  
KAREN LYNN HERZIG**

Registered Nurse License No. 424876

Respondent.

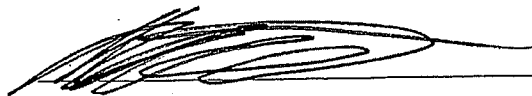
Case No. 2012-447

**DECISION**

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on July 3, 2012

IT IS SO ORDERED this July 3, 2012.



Erin Niemela  
Temporary Chair  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

1 KAMALA D. HARRIS  
Attorney General of California  
2 JANICE K. LACHMAN  
Supervising Deputy Attorney General  
3 ANAHITA S. CRAWFORD  
Deputy Attorney General  
4 State Bar No. 209545  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 322-8311  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2012-447

13 **KAREN LYNN FORD,**  
14 **aka KAREN L. FORD,**  
15 **aka KAREN LYNN HERZIG**  
2112 Motmot Court  
North Las Vegas, NV 89084  
Registered Nurse License No. 424876

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

Respondent.

17 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this  
18 proceeding that the following matters are true:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Interim Executive Officer of the  
21 Board of Registered Nursing. She brought this action solely in her official capacity and is  
22 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by  
23 Anahita S. Crawford, Deputy Attorney General.

24 2. Karen Lynn Ford (Respondent) is representing herself in this proceeding and has  
25 chosen not to exercise her right to be represented by counsel.

26 3. On or about April 30, 1988, the Board of Registered Nursing issued Registered Nurse  
27 License No. 424876 to Karen Lynn Ford, also known as Karen L. Ford and Karen Lynn Herzig  
28

1 (Respondent). The Registered Nurse License expired on June 30, 2007, and has not been  
2 renewed.

3 **JURISDICTION**

4 4. Accusation No. 2012-447 was filed before the Board of Registered Nursing (Board),  
5 Department of Consumer Affairs, and is currently pending against Respondent. The Accusation  
6 and all other statutorily required documents were properly served on Respondent on February 16,  
7 2012. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of  
8 Accusation No. 2012-447 is attached as Exhibit A and incorporated by reference.

9 **ADVISEMENT AND WAIVERS**

10 5. Respondent has carefully read, and understands the charges and allegations in  
11 Accusation No. 2012-447. Respondent also has carefully read, and understands the effects of this  
12 Stipulated Surrender of License and Order.

13 6. Respondent is fully aware of her legal rights in this matter, including the right to a  
14 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at  
15 her own expense; the right to confront and cross-examine the witnesses against her; the right to  
16 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to  
17 compel the attendance of witnesses and the production of documents; the right to reconsideration  
18 and court review of an adverse decision; and all other rights accorded by the California  
19 Administrative Procedure Act and other applicable laws.

20 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
21 every right set forth above.

22 **CULPABILITY**

23 8. Respondent admits the truth of each and every charge and allegation in Accusation  
24 No. 2012-447, agrees that cause exists for discipline and hereby surrenders her Registered Nurse  
25 License No. 424876 for the Board's formal acceptance.

26 9. Respondent understands that by signing this stipulation she enables the Board to issue  
27 an order accepting the surrender of her Registered Nurse License without further process.

28 //

**CONTINGENCY**

10. This stipulation shall be subject to approval by the Board of Registered Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Registered Nursing may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Surrender of License and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

12. This Stipulated Surrender of License and Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

13. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

**ORDER**

IT IS HEREBY ORDERED that Registered Nurse License No. 424876, issued to Respondent Karen Lynn Ford, is surrendered and accepted by the Board of Registered Nursing.

1. The surrender of Respondent's Registered Nurse License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent.

1 This stipulation constitutes a record of the discipline and shall become a part of Respondent's  
2 license history with the Board of Registered Nursing.

3 2. Respondent shall lose all rights and privileges as a Registered Nurse in California as  
4 of the effective date of the Board's Decision and Order.

5 3. Respondent shall cause to be delivered to the Board her pocket license and, if one was  
6 issued, her wall certificate on or before the effective date of the Decision and Order.

7 4. If Respondent ever files an application for licensure or a petition for reinstatement in  
8 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must  
9 comply with all the laws, regulations and procedures for reinstatement of a revoked license in  
10 effect at the time the petition is filed, and all of the charges and allegations contained in  
11 Accusation No. 2012-447 shall be deemed to be true, correct and admitted by Respondent when  
12 the Board determines whether to grant or deny the petition.

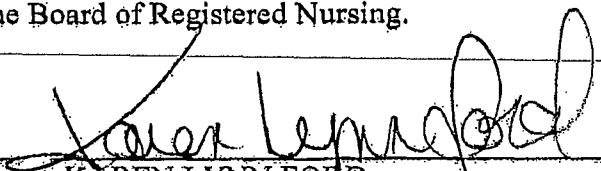
13 5. If and when Respondent's license is reinstated, she shall pay to the Board costs  
14 associated with its investigation and enforcement pursuant to Business and Professions Code  
15 section 125.3 in the amount of \$515.00. Respondent shall be permitted to pay these costs in a  
16 payment plan approved by the Board. Nothing in this provision shall be construed to prohibit the  
17 Board from reducing the amount of cost recovery upon reinstatement of the license.

18 6. Respondent shall not apply for licensure or petition for reinstatement for two (2)  
19 years from the effective date of the Board of Registered Nursing's Decision and Order.  
20

21 **ACCEPTANCE**

22 I have carefully read the Stipulated Surrender of License and Order. I understand the  
23 stipulation and the effect it will have on my Registered Nurse License. I enter into this  
24 Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to  
25 be bound by the Decision and Order of the Board of Registered Nursing.

26  
27 DATED: 4/16/12

  
KAREN LYNN FORD  
Respondent

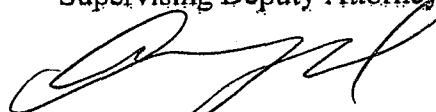
ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted  
for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated: 4.30.12

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
JANICE K. LACHMAN  
Supervising Deputy Attorney General



ANAHITA S. CRAWFORD  
Deputy Attorney General  
*Attorneys for Complainant*

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## **Exhibit A**

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**Accusation No. 2012-447**

1 KAMALA D. HARRIS  
Attorney General of California  
2 JANICE K. LACHMAN  
Supervising Deputy Attorney General  
3 ANAHITA S. CRAWFORD  
Deputy Attorney General  
4 State Bar No. 209545  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 322-8311  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2012-447

13 **KAREN LYNN FORD,**  
14 **aka KAREN L. FORD,**  
15 **aka KAREN LYNN HERZIG**  
16 **2112 Motmot Court**  
17 **North Las Vegas, NV 89084**  
18 **Registered Nurse License No. 424876**

**ACCUSATION**

Respondent.

19 Complainant alleges:

20 **PARTIES**

21 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her  
22 official capacity as the Interim Executive Officer of the Board of Registered Nursing ("Board"),  
23 Department of Consumer Affairs.

24 2. On or about April 30, 1988, the Board issued Registered Nurse License Number  
25 424876 to Karen Lynn Ford, also known as Karen L. Ford and Karen Lynn Herzig  
26 ("Respondent"). Respondent's registered nurse license expired on June 30, 2007.

27 **STATUTORY PROVISIONS**

28 3. Business and Professions Code ("Code") section 2750 provides, in pertinent part, that  
the Board may discipline any licensee, including a licensee holding a temporary or an inactive

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1 license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing  
2 Practice Act.

3 4. Code section 2764 provides, in pertinent part, that the expiration of a license shall not  
4 deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or  
5 to render a decision imposing discipline on the license. Under Code section 2811, subdivision  
6 (b), the Board may renew an expired license at any time within eight years after the expiration.

7 5. Code section 2761 states, in pertinent part:

8 The board may take disciplinary action against a certified or licensed  
9 nurse or deny an application for a certificate or license for any of the following:

10 (a) Unprofessional conduct . . .

11 . . . .

12 (4) Denial of licensure, revocation, suspension, restriction, or any other  
13 disciplinary action against a health care professional license or certificate by another  
14 state or territory of the United States, by any other government agency, or by another  
California health care professional licensing board. A certified copy of the decision  
or judgment shall be conclusive evidence of that action . . .

#### 15 COST RECOVERY

16 6. Code section 125.3 provides, in pertinent part, that the Board may request the  
17 administrative law judge to direct a licensee found to have committed a violation or violations of  
18 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
19 enforcement of the case.

#### 20 CAUSE FOR DISCIPLINE

##### 21 (Disciplinary Action by the Nevada State Board of Nursing)

22 7. Respondent is subject to disciplinary action pursuant to Code section 2761,  
23 subdivision (a)(4), on the grounds of unprofessional conduct, in that she was disciplined by the  
24 Nevada State Board of Nursing ("Nevada Board"), as follows: On or about May 18, 2011,  
25 pursuant to the Agreement for Reprimand in the disciplinary proceeding titled "In the Matter of  
26 Karen Ford Licensed Professional Nurse Nevada License No. RN43877", the Nevada Board  
27 ordered that Respondent be publicly reprimanded. A true and correct copy of the Agreement for  
28 Reprimand is attached as exhibit A and incorporated herein by reference. Respondent admitted

1 that on August 11, 2010, while working as a registered nurse in the recovery room of a Las Vegas  
2 hospital, she left the unit without giving proper report to another nurse, constituting  
3 unprofessional conduct.

4 PRAYER

5 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
6 and that following the hearing, the Board of Registered Nursing issue a decision:

- 7 1. Revoking or suspending Registered Nurse License Number 424876, issued to Karen  
8 Lynn Ford, also known as Karen L. Ford and Karen Lynn Herzig;  
9 2. Ordering Karen Lynn Ford, also known as Karen L. Ford and Karen Lynn Herzig, to  
10 pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of  
11 this case, pursuant to Business and Professions Code section 125.3;  
12 3. Taking such other and further action as deemed necessary and proper.

13  
14 DATED: February 16, 2012

Louise R. Bailey  
LOUISE R. BAILEY, M.ED., RN  
Interim Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
Complainant

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**EXHIBIT A**  
**Agreement for Reprimand**

# ORIGINAL

## BEFORE THE NEVADA STATE BOARD OF NURSING

IN THE MATTER OF  
KAREN FORD  
LICENSED PROFESSIONAL NURSE  
NEVADA LICENSE NO. RN43877  
RESPONDENT

AGREEMENT FOR REPRIMAND

CASE NO. 0856-10C

This Agreement is hereby entered into between KAREN FORD, (RESPONDENT) and the NEVADA STATE BOARD OF NURSING, (BOARD).

It is hereby stipulated and agreed, by and between the parties to the above-entitled matter, that the following statements are true:

1. Respondent is aware of, understands, and has been advised of the effect of this Agreement, which Respondent herein has carefully read and fully acknowledges. No coercion has been exerted on the Respondent. Respondent acknowledges her right to an attorney at her own expense. The Respondent has had the benefit at all times of obtaining advice from competent counsel of her choice.

2. Respondent understands the nature of the allegations under investigation by the Nevada State Board of Nursing. Respondent freely admits that on August 11, 2010 while working as a Registered Nurse in the recovery room of a Las Vegas hospital, she left the unit without giving proper report to another nurse. Respondent acknowledges this conduct constitutes a violation of the Nevada Revised Statutes 632.320 (1)(g) unprofessional conduct, and Nevada Administrative Code 632.890 (27) failing to perform nursing functions in a manner consistent with established or customary standards. Respondent further acknowledges that such acts and admissions subject her to disciplinary action by the Board.

3. Respondent is aware of the Respondent's rights, including the right to a hearing on any charges and allegations, the right to an attorney at her own expense, the right to examine witnesses who would testify against her, the right to present evidence in her favor and call

1 witnesses on her behalf, or to testify herself, the right to contest the charges and allegations, the  
2 right to reconsideration, appeal or any other type of formal judicial review of this matter, and any  
3 other rights which may be accorded to her pursuant to the Nevada Administrative Procedures Act  
4 and the provisions of Chapter 632 of the Nevada Revised Statutes and the Nevada  
5 Administrative Code. Respondent agrees to waive the foregoing rights upon acceptance of this  
6 Agreement by the Board.

7 4. Respondent understands that the Board is free to accept or reject this Agreement,  
8 and if rejected by the Board, a disciplinary proceeding may be commenced.

9 5. Should the Agreement be rejected by the Board, it is agreed that presentation to  
10 and consideration by the Board of such proposed Agreement, shall not disqualify the Board, or  
11 any of its members, from further participation, consideration, adjudication or resolution of these  
12 proceedings, and that no Board member shall be disqualified or challenged for bias therefore.

13 6. This Agreement shall only become effective when both parties have duly  
14 executed it and unless so executed, this Agreement will not be construed as an admission.

15 7. This Agreement shall not be construed as excluding or reducing any criminal or  
16 civil penalties or sanction or other remedies that may be applicable under federal, state or local  
17 laws.

18 8. This Agreement shall cover any nursing license and/or certificate issued by the  
19 State of Nevada.

20 9. Based upon the foregoing stipulations and recitals, it is hereby agreed that the  
21 Board may issue the following decision and order:

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## DECISION AND ORDER

Based on the foregoing, and good cause appearing therefore, it is hereby ordered that:

1. Respondent be publicly reprimanded.

2. As a condition of licensure/certification Respondent, within the first twelve (12) months of this Agreement, shall take, and successfully complete the following courses:

- a. Legal ethics in nursing for a minimum of 30 contact hours; and
- b. Critical thinking in nursing for a minimum of 30 contact hours; and
- c. The Nevada Nurse Practice Act web based course.

The courses must be pre-approved by the Executive Director, or the Director of Operations. Documentation of successful course completion must be submitted to the Board within twelve (12) months of the execution of this Agreement or the license/certificate is automatically suspended without further proceedings until all requirements are completed.

This Agreement will become part of the Respondent's permanent record, will become public information, will be published with the list of disciplinary actions the Board has taken, and may be reported to any national repository which records disciplinary action taken against licensees or holders of certificates; or any agency or another state which regulates the practice of nursing.

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1 The Agreement may be used in any subsequent hearings by the Board. In the event other  
2 misconduct is reported to the Board, this Agreement may be used as evidence against the  
3 Respondent to establish a pattern of behavior and for the purpose of proving additional acts of  
4 misconduct.

5 Dated this 8 day of April, 2011

Karen Ford  
RESPONDENT  
KAREN FORD

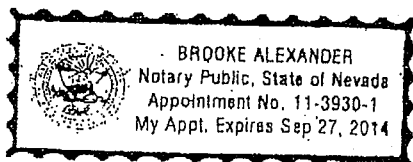
10 State of Nevada

11 County of Clark

12 This instrument was acknowledged before me on April 8, 2011, by Brooke  
13 Alexander

14 [Signature]  
15 Notary Public

17  
18 2008  
19 Accepted and approved this 8 day of April, 2011



NEVADA STATE BOARD OF NURSING

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By:

Doreen K. Begley  
Doreen Begley, MS, RN  
Board President

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**BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**Karen Lynn Ford  
a.k.a. Karen L. Ford  
a.k.a. Karen Lynn Herzig  
2112 Motmot Court  
North Las Vegas, NV 89084**

**Registered Nurse License No. 424876**

Respondent.

Case No. 2012-447

**STATEMENT TO RESPONDENT**

[Gov. Code §§ 11504, 11505(b)]

**TO RESPONDENT:**

Enclosed is a copy of the Accusation that has been filed with the Board of Registered Nursing of the Department of Consumer Affairs (Board), and which is hereby served on you.

A written request for a hearing signed by you must be received to the Board no later than March 2, 2012, which is within 15 days of when the Accusation was served on you or mailed to you. Otherwise, you will be deemed to have waived your right to a hearing in this matter and the Board may proceed upon the Accusation without a hearing and may take action thereon as provided by law.

The request for hearing may be made by faxing, delivering or mailing one of the enclosed forms entitled "Notice of Defense," or by faxing or mailing a Notice of Defense as provided in section 11506 of the Government Code, to

**Kami Pratab  
Legal Support Analyst  
Board of Registered Nursing  
P.O. Box 944210  
Sacramento, CA 94244-2100  
Fax No. (916) 574-7609**

You may, but need not, be represented by counsel at any or all stages of these proceedings.

The enclosed Notice of Defense, if signed and filed with the Board, shall be deemed a specific denial of all parts of the Accusation, but you will not be permitted to raise any objection.



1 to the form of the Accusation unless you file a further Notice of Defense as provided in section  
2 11506 of the Government Code within fifteen (15) days after service of the Accusation on you.

3 If you file any Notice of Defense within the time permitted, a hearing will be held on the  
4 charges made in the Accusation.

5 The hearing may be postponed for good cause. If you have good cause, you are obliged to  
6 notify the Office of Administrative Hearings - Sacramento 2349 Gateway Oaks Dr, Suite 200,  
7 Sacramento, CA 95833-4231, within ten (10) working days after you discover the good cause.  
8 Failure to notify the Office of Administrative Hearings within ten (10) days will deprive you of a  
9 postponement.

10 Copies of sections 11507.5, 11507.6, and 11507.7 of the Government Code are enclosed.

11 If you desire the names and addresses of witnesses or an opportunity to inspect and copy  
12 the items mentioned in section 11507.6 of the Government Code in the possession, custody or  
13 control of the Board you may send a Request for Discovery to the designated Deputy Attorney  
14 General at the address below:

Anahita Crawford  
Deputy Attorney General  
California Department of Justice  
1300 I Street, Suite 125, P. O. Box 944255  
Sacramento, CA 94244-2550  
(916) 322-8311

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19 **NOTICE REGARDING STIPULATED SETTLEMENTS**

20 It may be possible to avoid the time, expense and uncertainties involved in an  
21 administrative hearing by disposing of this matter through a stipulated settlement. A stipulated  
22 settlement is a binding written agreement between you and the government regarding the matters  
23 charged and the discipline to be imposed. Such a stipulation would have to be approved by the  
24 Board of Registered Nursing but once approved; it would be incorporated into a final order.

25 Any stipulation must be consistent with the Board's established disciplinary guidelines;  
26 however, all matters in mitigation or aggravation will be considered. A copy of the Board's  
27 Disciplinary Guidelines will be provided to you on your written request to the state agency  
28 bringing this action.

1 If you are interested in pursuing this alternative to a formal administrative hearing, or if you  
2 have any questions, you or your attorney should contact Deputy Attorney General, Anahita  
3 Crawford at the earliest opportunity.  
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